

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

KRISTEN FREDRICKS, JOSEPH V. CUFFARI,)
JOSEPH E. GANGLOFF, and JAMES M. READ)

Plaintiffs,)

v.)

No. 1:23-cv-442 (RDA/LRV)

COUNSEL OF THE INSPECTORS GENERAL)
ON INTEGRITY AND EFFICIENCY (“CIGIE”))
INTEGRITY COMMITTEE (“IC”); KEVIN H.)
WINTERS, Chairman, IC, in his official capacity;)
ROBERT P. STORCH, Vice-Chairman, IC, in his)
official capacity; GAIL S. ENNIS, Member, IC, in)
her official capacity; KIMBERLY A. HOWELL,)
Member, IC, in her official capacity; DALE A.)
CHRISTOPHER, Deputy Director for Compliance,)
U.S. Office of Government Ethics, in his official)
capacity; TOM MONHIM, Member, IC, in his)
official capacity; CATHERINE S. BRUNO, Member,)
IC, in her official capacity; ALLISON LERNER,)
Inspector General, National Science Foundation,)
Former Chair and Vice Chair, CIGIE, in her official)
capacity,)

Defendants.)

**DEFENDANTS’ UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO FILE A
RESPONSE TO PLAINTIFFS’ COMPLAINT**

Defendants in their official capacities and through the undersigned counsel, respectfully submit this unopposed motion for an extension of time to file their response to Plaintiffs’ complaint (Dkt. No. 1). In support thereof, Defendants set forth the following background and good cause for the requested scheduling relief.

1. Plaintiffs brought this action arising out of their interactions with the Counsel of the Inspectors General on Integrity and Efficiency, Integrity Committee (“CIGIE IC”), and bring

six claims challenging the CIGIE IC's function and its handling of complaints made against the Plaintiffs. *See* Compl. (Dkt. No. 1).

2. Plaintiffs served the United States Attorney's Office by hand delivery on April 6, 2023. Accordingly, pursuant to Federal Rule of Civil Procedure 12(a)(2), Defendants' response to Plaintiffs' complaint is currently due on June 5, 2023.

3. The undersigned counsel respectfully request an eighteen-day extension of time, until June 23, 2023, to prepare the response to the Complaint. The undersigned counsel require additional time to coordinate with the offices of multiple named defendants in preparing the response and to allow those offices the opportunity to review the response in advance of filing.

4. In addition, Defendants seek this extension to accommodate the pre-paid, pre-planned travel of the undersigned counsel and a supervisor who will need to review the response in advance of filing.

5. Defendants have not previously requested an extension of their time to respond to Plaintiffs' complaint, and granting this request will not require the modification of any existing deadlines.

6. Accordingly, Defendants respectfully request an extension of time, until June 23, 2023, to file their response to Plaintiffs' complaint.

7. Plaintiffs' counsel has informed the undersigned counsel that Plaintiffs do not oppose the relief requested in this motion.

8. A proposed order is attached for the Court's convenience.

Dated: May 30, 2023

Respectfully submitted,

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

JESSICA D. ABER
UNITED STATES ATTORNEY

/s/

REBECCA S. LEVENSON
Assistant United States Attorney
Office of the United States Attorney
2100 Jamieson Avenue
Alexandria, Virginia 22314
Tel: (703) 299-3760
Fax: (703) 299-3983
Email: rebecca.s.levenson@usdoj.gov

CHRISTOPHER R. HALL
Assistant Branch Director
Federal Programs Branch

CHRISTOPHER A. EISWERTH
Trial Attorney
United States Department of Justice
Civil Division, Federal Programs Branch
1100 L. Street, NW
Washington, DC 20044
Tel.: (202) 305-0568
Fax: (202) 616-8460
Email: christopher.a.eiswerth@usdoj.gov

Counsel for Defendants